



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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**MAR 18 2016**

Mr. Todd Parfitt, Director  
Wyoming Department of Environmental Quality  
200 West 17<sup>th</sup> Street  
Cheyenne, Wyoming 82002

Dear Mr. Parfitt:

I appreciate the opportunity for the U.S. Environmental Protection Agency to provide input on the Wyoming Department of Environmental Quality's Pavillion, Wyoming Area Domestic Water Wells Draft Final Report and Palatability Study dated December 14, 2015.<sup>1</sup> Throughout Wyoming's sustained commitment to further investigation of groundwater quality concerns near Pavillion, the EPA has provided technical resources and assistance to support the state. For example, the EPA provided initial input to the state on pits and gas well integrity on August 16, 2013 and further provided comments on the state's gas well integrity and pits draft reports on September 5, 2014 and January 16, 2015 respectively. Continuing in that spirit, the EPA offers the enclosed comments on the Domestic Water Wells Draft Final Report for your consideration.

The EPA has reviewed the Draft Final Report and recognizes the extensive effort that it represents in compiling and analyzing available data on domestic water well water quality as well as collecting additional sampling data from some domestic wells. The EPA's detailed technical input is provided in the enclosed comments, which generally encompass the following issue areas: (1) The EPA suggests that the uncertainties in the analysis of health concerns associated with domestic well water quality be discussed in the Report; (2) the EPA concurs with recommendations made in previous state reports that a conceptual model of the geology/hydrogeology and potential contaminant transport pathways is critical to understanding potential source contributions and recommends this be addressed in the Report; and (3) several conclusory statements in the Report regarding fluid movement and potential sources of constituents would benefit from more robust supporting data and information and a discussion of uncertainties.

The EPA appreciates Wyoming's continued efforts to understand and address water quality concerns in the Pavillion area. I hope these comments are useful to you. If you or your staff have

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<sup>1</sup>As the EPA has noted in previous communications providing technical input to the State of Wyoming on this matter, the EPA will continue to consult and coordinate with the Northern Arapaho and Eastern Shoshone Tribes of the Wind River Reservation, given the government-to-government relationship we have with the Tribes. EPA's transmittal of these comments to the State is intended to convey our technical considerations only and should not be construed as setting forth any position regarding the exterior boundaries of the Wind River Reservation or the exercise of State authorities in this area such as, for example, the applicability of State water quality limits or State authority with regard to gas well pits.

questions or wish to discuss these comments, please feel free to contact me at (303)312-6776 or hestmark.martin@epa.gov, or contact my Deputy, Sandy Stavnes, at (303)312-6117 or stavnes.sandra@epa.gov.

Sincerely,



Martin Hestmark  
Assistant Regional Administrator  
Office of Ecosystems Protection  
& Remediation

Enclosure

cc: Darwin St. Clair, Jr.  
Chairman, Eastern Shoshone Tribe

Dean Goggles  
Chairman, Northern Arapaho Tribe